

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Ravidath Lawrence RAGBIR, et. al,

Plaintiff,

v.

Thomas HOMAN, in his official capacity as
Acting Director of Immigration and Customs
Enforcement, *et. al*,

Defendant.

Civil Action No. 18-cv-01159-PKC

Hon. P. Kevin Castel

**PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 33, by and through their attorneys of record, Plaintiffs request that Defendants, or those authorized to act on behalf of Defendants, respond to the following Interrogatories.

Notwithstanding any definition set forth below, each word, term, or phrase used in these Requests is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure. As used in these Requests, the following terms are to be interpreted in accordance with the following definitions.

DEFINITIONS

1. COMMUNICATION or COMMUNICATIONS means any contact between two or more PERSONS (including any individual, corporation, proprietorship, partnership, association, government agency or any other entity) by which any information, knowledge or opinion is transmitted or conveyed, or attempted to be transmitted or conveyed, and shall include,
2. IDENTIFY means:

- a. When referring to a person, you shall set forth the following information: (i) Full Name; (ii) Present or last known residential address; (iii) Present or last known telephone number; (iv) Present occupation, job title, employer and employer's address; and (v) Occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory.
 - b. When referring to a document, you shall set forth the following information: (i) the nature (*e.g.*, e-mail, letter, handwritten note) of the document; (ii) the subject line, title, or heading that appears on the document; (iii) the date of the document and the date of each addendum, supplement or other addition or change; (iv) identification of the author and of the signer thereof, and of the person on whose behalf or at whose request or direction the document was prepared or delivered; (v) identification of the addressee or recipient thereof, if any; and (vi) the present locations of the document, and the name, address, position or title, and telephone number of the person or persons having custody. When referring to an event, occurrence, act, transaction or conversation, you shall set forth the following information: (i) the date and place of such event; (ii) the persons involved; and (iii) a description of the event.
3. PERSON OR PERSONS means any natural person, firm, partnership, association, joint venture, public or private corporation, individual, proprietorship, governmental entity, organization, other enterprise, group of natural persons or other entity that has a separate legal existence.

INSTRUCTIONS

1. The word "any" includes all and the word "all" includes any.

2. Defendants shall answer each Request and each part or subpart of a Request separately. Defendants shall leave no part of a Request unanswered merely because an objection is interposed to another part of the Request. If Defendants are unable to answer fully any of these Requests, after exercising due diligence to secure the information to do so, Defendants should so state, answer to the extent possible, specify Defendants' inability to answer the remainder and provide or state whatever information is in Defendants' possession, custody, control, or knowledge concerning any unanswered portion.
3. If Defendants object to or otherwise decline to answer any portion of a Request, Defendants shall identify the portion of the Request to which they object or otherwise decline to answer, state with particularity the reason for such objection or declination, and identify each PERSON or organization having knowledge of the factual basis, if any, upon which the objection, privilege, or other ground is asserted.
4. To the extent that these interrogatories request the production of responsive DOCUMENTS, Defendants should produce all responsive DOCUMENTS within the sole or joint possession, custody, or control of Defendants including, but not limited to, any such DOCUMENT or thing that is within the possession, custody, or control of any agents, agencies, departments, attorneys, employees, consultants, investigators, representatives, or other PERSONS or entities acting for, or otherwise subject to the control of, Defendants.
5. For any responsive DOCUMENT or portion thereof that is either redacted or withheld, in whole or in part, on the basis of any assertion of privilege or other asserted exemptions from discovery, identify each DOCUMENT so redacted or withheld. With regard to all DOCUMENTS or portions of documents redacted or withheld on this basis, identify: